

	8.4	FILE #6
SITE NAME: SIT:		

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 5, 2010

SITE NAME: OLD BREMENTON GAS HOPES & SESCO PROPERTY

Cascade Natural Gas Company C T Corporation System 1801 West Bay Drive Northwest, Suite 206 Olympia, Washington 98502-4311

RE: Notice of Potential Liability under the Model Toxics Control Act for the Release of Hazardous Substances at the following Hazardous Waste Site:

- Name: Old Bremerton Gasworks and Sesko Property
- Address: 1725 Pennsylvania Avenue, Bremerton, Washington 98310
- Kitsap County Assessor's Parcel Numbers: 3711-000-001-0409, 3711-000-001-0607, 3711-000-022-0101 and the associated impacted aquatic lands
- Facility/Site Number: 2641

Dear Sir/Madam:

Under the Model Toxics Control Act (MTCA), chapter 70.105D RCW, which governs the cleanup of hazardous waste sites in Washington State, the Department of Ecology (Ecology) may identify persons that it finds are liable for the release of hazardous substances at a site. Before making such a finding, Ecology must provide persons with notice and an opportunity to comment on the proposed finding. Any person whom Ecology finds, based on credible evidence, to be liable is known as a "potentially liable person" or "PLP".

Proposed Finding of Liability

Based on credible evidence, Ecology is proposing to find the Cascade Natural Gas Company is liable under RCW 70.105D.040 for the release of hazardous substances at the Old Bremerton Gasworks and Sesko Property facility (Site). This proposed finding is based on the following evidence:

1. According to our information, the Cascade Natural Gas Company was the owner and operator of a gasification plant from 1953 until late 1960s or early 1970s located at 1725 Pennsylvania Avenue, Bremerton, Washington 98310 (Enclosure 1), and credible evidence exists indicating that a "release or threatened release" of a "hazardous substance" has occurred at the facility as defined in RCW 70.105D.020(7) and (20), which poses a threat to human health or the environment.



Cascade Natural Gas Company March 5, 2010 Page 2 of 6

- 2. Ecology understands that the gasification plant was operated by other companies (Western Gas Company and Bremerton Gas Company) until 1953. In 1953, several local gas companies merged and formed Cascade Natural Gas Company which operated the gasification plant until late 1960s or early 1970s. Also, reports indicate that the Western Gas Company's waste disposal practices included dumping of tar-laden wood, tar-covered excelsior and soot from the water gas machine to fill a gully at the edge of the plant; dumping of tar emulsion in shallow pits dug at random on the grounds; discharge of effluent (a mixture of water, tar and oil) into the Port Washington Bay through a pipe; and other inappropriate handling of the gasification waste (Enclosure 3). Ecology believes that similar waste-handling practices were continued by the CNGC until it ceased its operation in late 1960s or early 1970s.
- 3. The Site was listed on Ecology's confirmed and suspected contaminated sites list in September 1994 following an initial investigation conducted from August 1993 through April 1994. In early 1995, a subsequent investigation was conducted by the Ecology as a part of the site hazard assessment (SHA) to rank the site. Results of these soil investigations showed elevated levels of polyaromatic hydrocarbons (PAHs), benzo(a)pyrene (1,810 mg/kg), benzo(b)flouranthene (2,720 mg/kg), naphthalene (6,700 mg/kg) and phenathrene (24,400 mg/kg) which exceed the Model Toxics Control Act (MTCA) Method A cleanup levels. Based on these results, the Site was ranked using the Washington Ranking Method. The Site scored a ranking of 1 out of a possible 5; 1 being the most contaminated site and 5 being the least contaminated site.
- 4. Polyaromatic hydrocarbons and some of the petroleum-related compounds are typical constituents of gasification waste. Since PAHs and other related contaminants were detected during the SHA, City of Bremerton, and Environmental Protection Agency Region 10 investigations, Ecology believes that the CNGC's previous operational activities and disposal practices have adversely impacted the Site soils, groundwater, and the adjacent sediments as discussed below. Also, Ecology recognizes that there may be other sources in the vicinity of the Site.
 - (a) In 2006, the City of Bremerton conducted a Preliminary Upland Assessment of the Site. Also, in 2008 the Environmental Protection Agency Region 10 conducted a Targeted Brownfield Assessment of the Site. As a part of these investigations, a number of soil, groundwater, and sediment samples were collected and analyzed for metals, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polyaromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPH-gasoline, diesel and oil). Results of these investigations showed that concentrations of a number of metals, VOCs, SVOCs, PAHs, and TPHs exceeded the Model Toxics Control Act (MTCA) cleanup levels.

- (b) The above investigations included the collection of a number of soil samples at different depths from fourteen borings (MW-1 through MW-7, MP01 through MP03 and SP01 through SP03). Results of soil samples revealed the elevated levels of arsenic (0.83 mg/kg 48.4 mg/kg), naphthalene (14.7 mg/kg 2,290 mg/kg), benzene (0.04 mg/kg 12 mg/kg), TPH-gasoline (10.6 mg/kg 645 mg/kg), TPH-diesel (17.1 mg/kg 30,200 mg/kg), and toxicity equivalent (TEQ) cPAHs 0.11 mg/kg 155.5 mg/kg). The above concentrations exceed MTCA Method A and/or Method B cleanup levels (Enclosure 4).
- (c) As a part of the groundwater investigation, seven groundwater monitoring wells (MW-1 through MW-7) were installed. In addition, seven groundwater samples were collected from borings MP01 through MP04 and SP01 through SP03. Results of 12 groundwater samples showed elevated concentrations of arsenic (1.43 ug/l 4,100 ug/l), total chromium (177 ug/l 845,000 ug/l), lead (18.3 ug/l 268,000 ug/l), barium (5,840,000 ug/l), benzene (25.5 ug/l 3,100,000 ug/l), ethylbenzene (26 ug/l), TPH-gasoline (68.5 ug/l 10,600 ug/l), TPH-diesel (447 ug/l 18,500 ug/l), naphthalene (0.45 ug/l 1,800,000 ug/l) and TEQ cPAHs (0.32 ug/l 45.24 ug/l). All of these concentrations exceed MTCA Method A and/or Method B cleanup levels (Enclosure 5).
- (d) In 2008, EPA collected a total of five intertidal sediment samples (WN01 through WN05) at a depth of 30 centimeters below ground surface. These samples were analyzed as per the requirements of Sediment Management Standards (Chapter 173-204 WAC). Results of these sediment samples showed elevated levels of number of PAHs, indicating an adverse impact on the sediments (Enclosure 6).

The evidence supporting the above findings is presented in the following documents:

- 1. Ecology and Environment, August 2009, Final Bremerton Gasworks, Targeted Brownfields Assessment Report, Bremerton, Washington. Prepared for the United States Environmental Protection Agency, Region 10.
- 2. Ecology and Environment, March 2008, Bremerton Gasworks, Targeted Brownfields Assessment Sampling and Quality Assurance Plan, Bremerton, Washington. Prepared for the United States Environmental Protection Agency, Region 10.
- 3. HartCrowser, May 2, 2007, Historical Characterization and Data Gaps, Old Bremerton Gasworks Property, 1725 Pennsylvania Avenue, Bremerton, Washington. Prepared for the Washington State Department of Ecology.

Cascade Natural Gas Company March 5, 2010 Page 4 of 6

- 4. GeoEngineers, October 26, 2007, Preliminary Upland Assessment report, McConkey/Sesco Site, Bremerton, Washington. Prepared for the City of Bremerton.
- 5. Department of Ecology, March 1995, Site Hazards Assessment Report, Old Bremerton Gasworks (Formerly Plaza and Sesco Properties), Bremerton, Washington.
- 6. Department of Ecology, August 1993 through April 1994, Initial Investigations Results, Ecology inspection reports and correspondences, Old Bremerton Gasworks (Formerly Plaza and Sesco Properties), Bremerton, Washington.

The reports listed above will be kept in the Central Files of the Toxics Cleanup Program, Headquarters (TCP HQ) of Ecology for review by appointment only. If you are interested in reviewing any of the above documents, please make an appointment by calling the TCP HQ resource contact at (360) 407-7224.

As a result of the evidence (information) contained in the above-cited reports, the Cascade-Natural Gas Company has been identified as a party potentially liable for the existing release at the Old Bremerton Gasworks and Sesko Property site.

Opportunity to Respond to Proposed Finding of Liability

In response to Ecology's proposed finding of liability, you may either:

- 1. Accept CNGC's status as a PLP without admitting liability and expedite the process through a voluntary waiver of your right to comment. This may be accomplished by signing and returning the enclosed form (Enclosure 2) or by sending a letter containing similar information to Ecology.
- 2. Challenge CNGC's status as a PLP by submitting written comments to Ecology within thirty (30) calendar days of the date you receive this letter.
- 3. Choose not to comment on CNGC's status as a PLP.

Please submit your waiver or written comments to me at the address on the letterhead.

After reviewing any comments submitted or after 30 days if no response has been received, Ecology will make a final determination regarding CNGC's status as a PLP and provide you with written notice of that determination.

Cascade Natural Gas Company March 5, 2010 Page 5 of 6

Identification of Other Potentially Liable Persons

Ecology has notified the following additional persons that they may be potentially liable for the release of hazardous substances at the Site:

Mr. Paul McConkey Penn Plaza Industrial Park 1500 Thompson Drive Bremerton, WA 98310 Telephone number: (360) 377-4457

Ms. Natasha Sesko 3536 West Arsenal Way Bremerton, WA 98312 Telephone number: (206) 498-0758

If you are aware of any other persons who may be liable for the release of hazardous substances at the Site, Ecology encourages you to provide us with their identities and the reason with credible evidence why you believe they are liable. Ecology also suggests you contact these other persons to discuss how you can jointly work together to most efficiently clean up the Site.

Responsibility and Scope of Potential Liability

Please note that Ecology may either conduct or require PLPs to conduct remedial actions to investigate and clean up the release of hazardous substances at a site. PLPs are encouraged to initiate discussions and negotiations with Ecology and the Office of the Attorney General that may lead to an agreement on the remedial action to be conducted.

Please also note that each liable person is strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release of hazardous substances at a site. If Ecology incurs remedial action costs in connection with the investigation or cleanup of real property and those costs are not reimbursed, then Ecology has the authority under RCW 70.105D.055 to file a lien against that real property to recover those costs.

Next Steps in Cleanup Process

In response to the release of hazardous substances at the Site, Ecology intends to meet with PLPs to determine the actions necessary to proceed with the investigation, cleanup, and to discuss the terms of a Model Toxics Control Act agreed order.

Cascade Natural Gas Company March 5, 2010 Page 6 of 6

Ecology's policy is to work cooperatively with PLPs to accomplish the prompt and effective cleanup of hazardous waste sites. Please note that your cooperation in planning or conducting remedial actions at the Site is not an admission of guilt or liability. For a description of the process for cleaning up a hazardous waste site under MTCA, please refer to the enclosed fact sheet.

Contact Information

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of hazardous waste sites, please call Panjini Balaraju at (360) 407-6161.

Thank you for your cooperation.

Sincerely,

Tim L. Nord, Manager

Land and Aquatic Lands Cleanup Section

Toxics Cleanup Program

Enclosures:

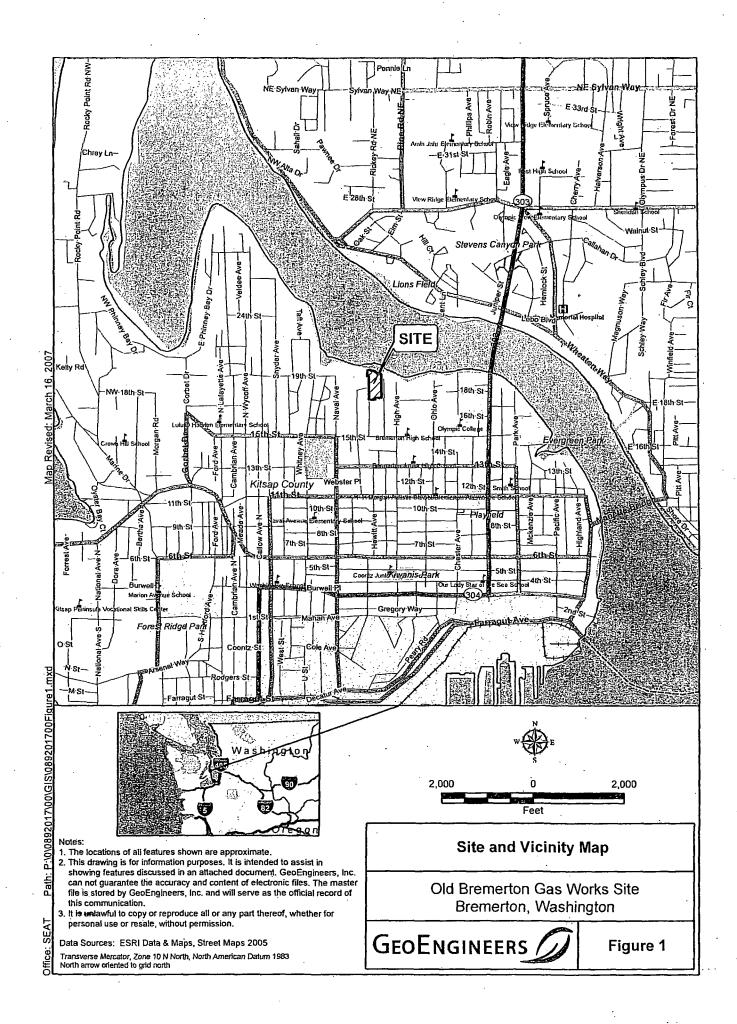
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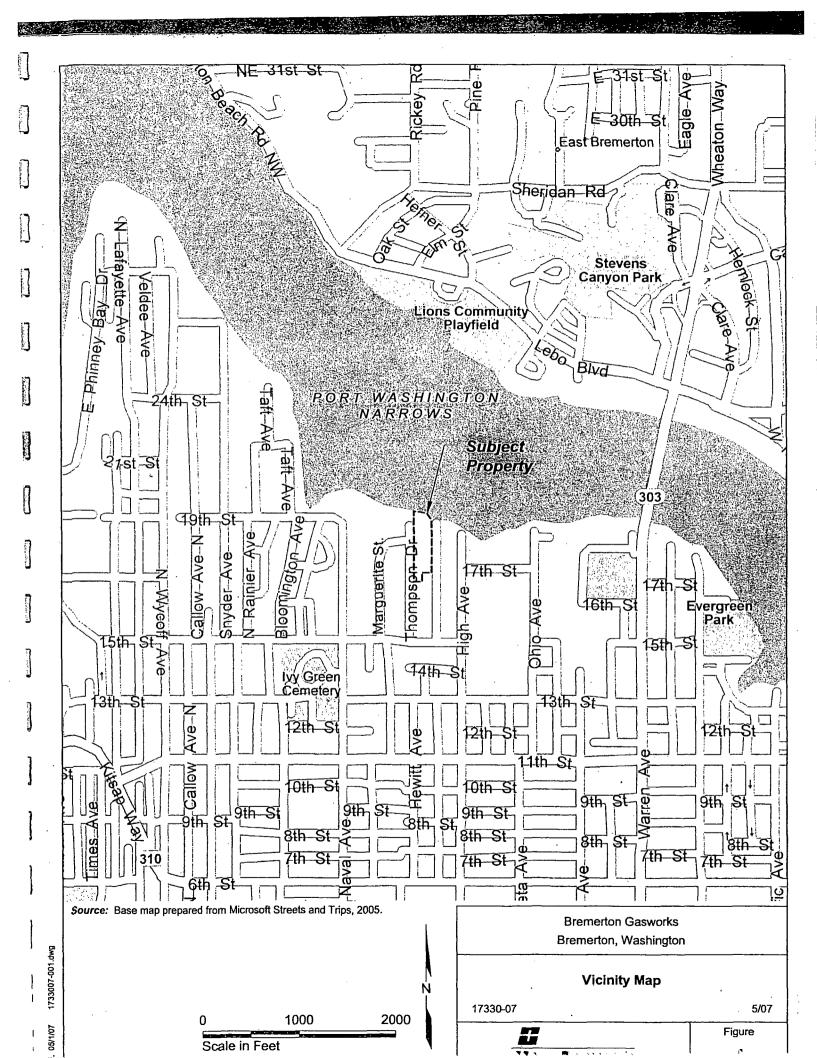
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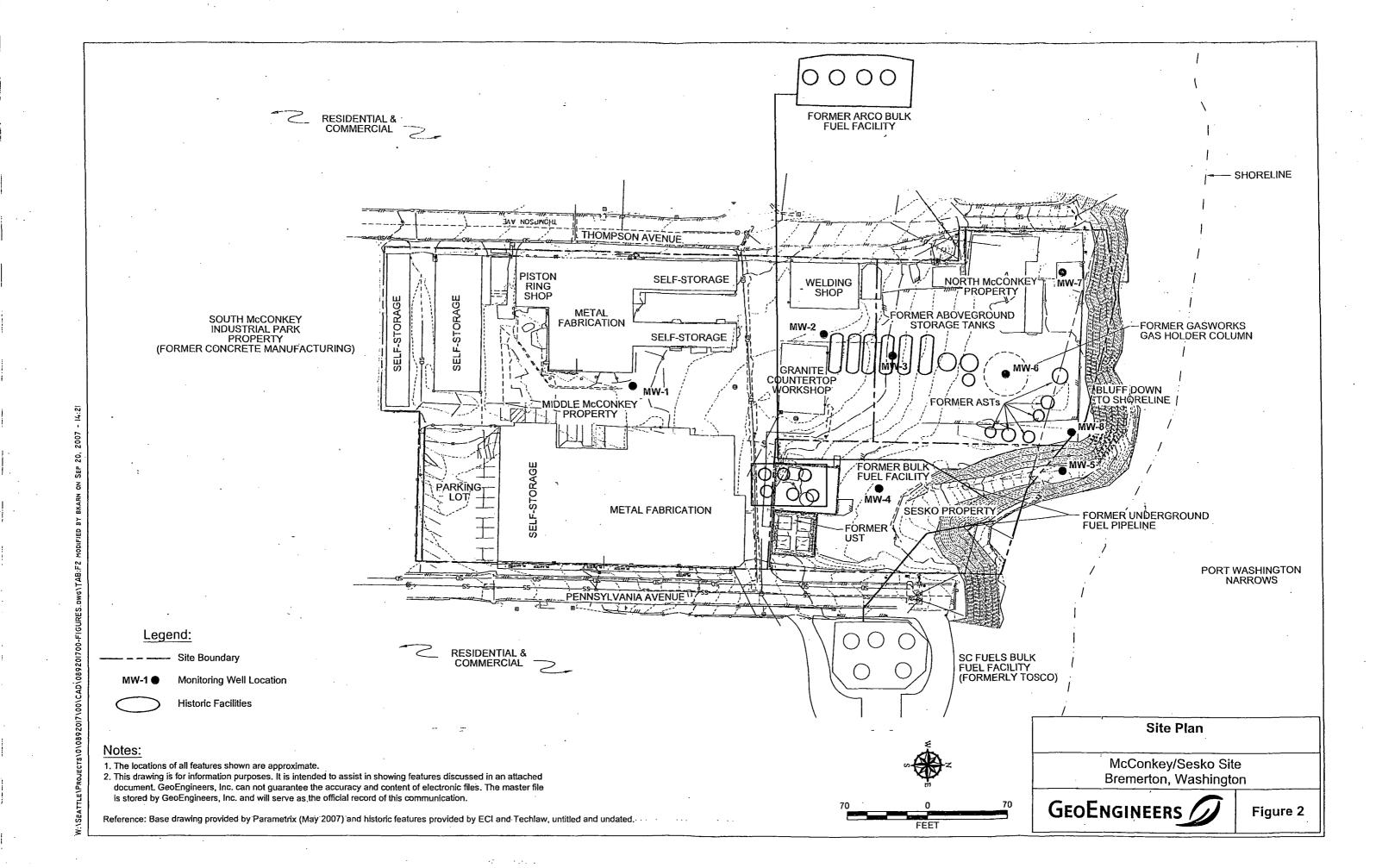
Howard Jensen, Tupper Mack Brower PLLC

Paul McConkey Natasha Sesko

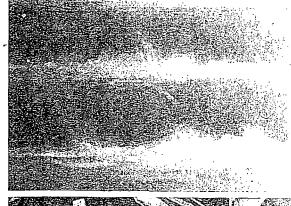
ENCLOSURE - 1

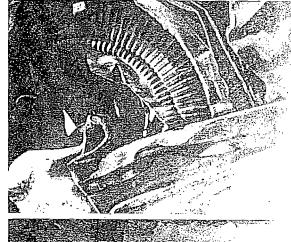


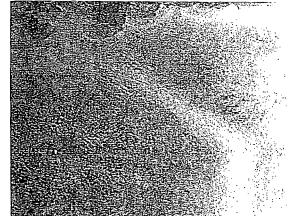


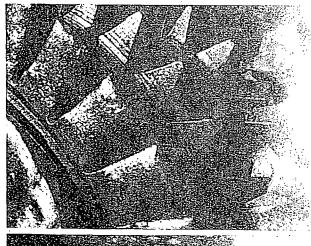


ENCLOSURE - 2











Historical Characterization and Data Gaps Old Bremerton Gasworks Property 1725 Pennsylvania Avenue Bremerton, Washington

Prepared for Washington State Department of Ecology

May 2, 2007 17330-07



APPENDIX C HISTORICAL DOCUMENT REGARDING THE WESTERN GAS COMPANY

An Investigation of The Western Gas Company of Washington Bramerbon, Washington

perbaining to

Fire-Hamard at the Gas Plant

Disposal of By-Products

Proposed Piping Ordinance

by

Spiren R. Treebra

Registered Boginser

Associate Professor of Machanical Maginsering

Undversity of Washington

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CE: This material may be protected writing the code of the code of

665.7

The Honorable H. A. Bruenn Mayor of the City of Bramarton Bramarton, Mashington

Dear Sire

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Attached you will find the results of the investigation requested in your latter of March 14 pertaining
to (1) fire-bazard at the local plant, (2) disposal of
by-products, and (3) the proposed piping ordinance.
Included in the report are suggested residual sessures
for the conditions which were found to enish.

proper to establish stather or not it will be able to supply the demand for gas if the city of Bremerton, its supremeding territory, and the Newy Tard continue to great at the present rate. I shall be ready to make a further report at any time you express the wish for such additional investigation.

Respectfully selection,

C D Presentation

AN INVESTIGATION OF THE MESTERN CAS COMPANY OF WASHINGTON

A STATE OF THE REST

The Western Ges Company of Mashington, located at Bremerton, Washington, was inspected on March 25 to establish whether or not it constituted a fire hazard and what disposed may be made of those by products which cannot be sold. Moreover, the request made by the City Conneil to scrutinize the proposed ordinance for "The Installation in Maintenance, and Use of Piping and Pittings for City Cas" in customers' premises, was sampled with.

The inspection trip to the gas plant was conducted by the Fire Chief, the Gas Plant Manager, and the ariter.

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The plant itself is in a condition which can best be described as "better than average". About 700,000 cubic feet of carburated water gee of 500 British thermal units heating value is sade per day, and leaves the plant at a pressure of 10 pounds per equare luch. This output seems to be close to the capacity of the plant. May extensive growth of Bremerton, its surrounding terribory, or the Havy fard may, before long, demand increased gas manufacturing capacity.

a character of the contract of the parties of the characters of th

For the reserval of tar from the gas, it is passed through apparatus
filled with mood ships. In the past, excelsion was used for this purpose.

While removing the tar from the gas, this saturally itself becomes covered
with It and must finally be disposed of. Saturation occurs to a legaer
extent with the Loop oxide covered ships in other apparatus used for the
removal of militar compounds from the gas.

The ter-laden wood ships and also the previously used ter-covered excelsior, as well as soot from the mater-gas machines, is dusped at the edge of the plant near the oil-storage tanks in order to fill a gully. Tests conducted at the plant showed that (1) the soot will burn moderately, just about like fine coal; (2) the wood chips will burn somewhat better, just like kindling; and (3) the ter-coaked excelsior, when lighted, will flare up—as was to be expected. This condition, and particularly the proximity of the dusp to the oil-storage tanks, constitutes a distinct fire hazard; especially so as no adequate fire protection is available in this section of the city.

DISPOSAL OF SY-PRODUCTS

For Edition with the con-

The by-predects of the gas plant sensist of makes gas tar, a tarcomplaint (combination of ter and cater), and its affinest liquer, which
is sootly water sized with a little ter and oil.

The tax proper is seld to the Serrett Company and is shipped to Comman. The officers liquor is lately being scaled to recove its condensable vapore sed in sect to the tay through a drain pipe. The tay emission is despend in the ground.

Tests conducted at the plant show that the exclusion carries so such water that it will not burn in its present state, not even when exposed to a benfire. Therefore, it is decidedly not a fire hazard.

The pits or pools containing this semision are not guarded or femed in, and therefore constitute a safety hazard for children playing around them and for others cutting across the vecant property on shich these pits are leasted.

THE PIPING CONTRACTS

The proposed piping ordinance has been carefully examined. It is found to be an excellent one as a minio, but experience with it has pointed to some dispreparates, inaccuracies, and gven some impossibilities.

RECOMMENDATIONS

PIRE HAZARD

- a. A fire plug or hydrant should be installed in the street in front of the gas plant, and should be connected to the water main located there. This hydrant will also give fire protection to the houses scross the street.
- b. The ter-laden excelsior which is exposed to sight or easily accessible should be raked out of the dump, carried to a safe place, and burneds
- or raked out and be covered with a layer of the most. This, in turn, should be covered with a layer of the most. This, in turn, should be covered with a layer of the sahes and cinders now desped elsewhere. Care should be taken to have the ashes and cinders thoroughly quenched.

These suggestions will eliminate the fire heard and change it to a safe dusp.

Of course, the chips could also be burned if convenient, but this is not considered necessary if they are covered as suggested.

THE DISPOSAL OF BY-PRODUCTS

F 30 350

Long as it does not constitute too great a prisance. Otherwise, it should be passed through a note filter, which will absorb some of its objectionable constituents. The coke itself them enturated with these can be used up in the water-gas anchines. However, the new cooler may have sufficiently oldered up this situation.

by The sauleing could be used as road material, either after being breated, or as it is. In either case, the second involved is too sail to

to dispose of this at its own discretion, in either of two ways: (1) to cover the unpaved road to its own plant with a very thin layer, if the city will immediately cover it with sand; (2) to continue to dusp it in shallow pits, but to put a simple and insupensive fence around these, and ultimately to cover them with dirt. The fence will enfoguard the pits sufficiently so as to recove all danger.

THE PIPING ORDINANCE

The following changes are recommended in the proposed piping ordinance:

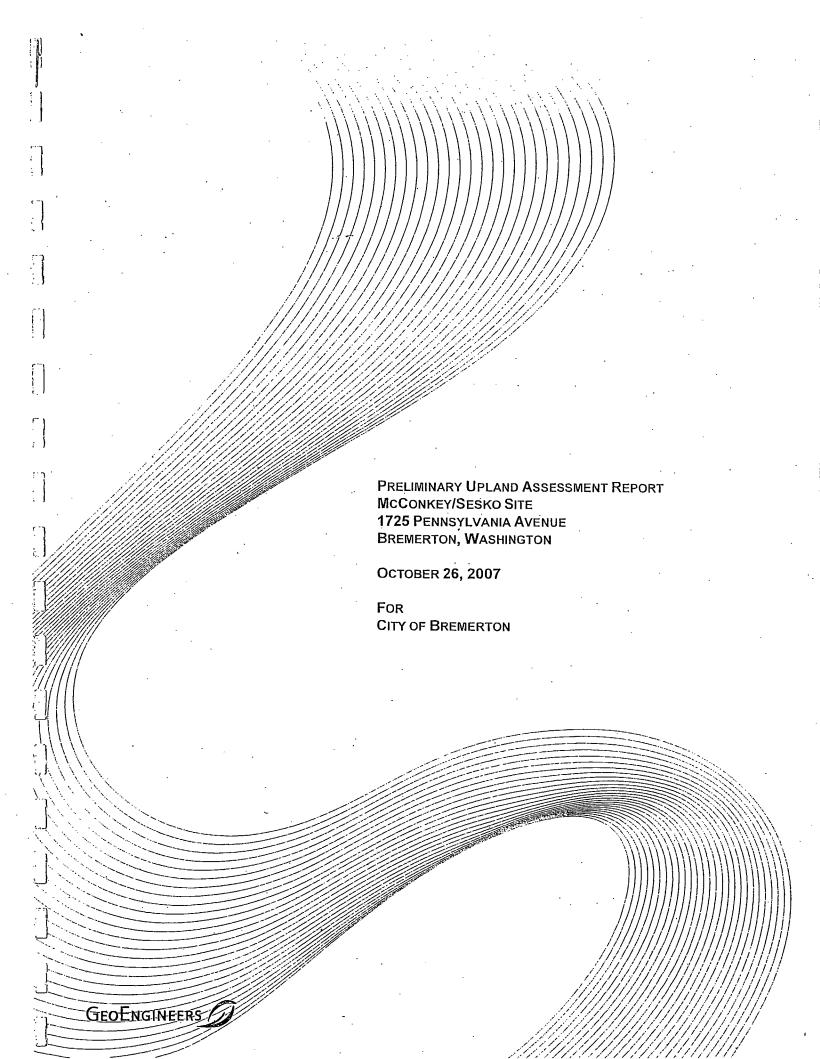
- 3-b Fourth line: change the word spavers to snots.
- 3-f Add and an extension light complete with grands.
- b-a Add south eraftemen shall also install the electric wiring between the shandard electric system and any step-down transformer (similar to a deorball transformer) furnishing a low voltage current for any gas-ragnishing device.
- 6-a b should come first and be called as a should come second and be called b.
- 8 Do not add the words "30 lbs air pressure", inserted in red in the code. Section 4 of the appendix covers the details of testing.
- Heference is made in a and b to "a gas fitter not in the employ of the gas company". In g and d reference is made to "a gas fitter", but "a gas fitter not in the employ of the gas company" is mant.
- 12-c Fourth line; delete for into the compaction. .. burning flower.
- 14-a Winth Line: change the word "book" to "standard".
- li-d Fourth liver change the word "perfect" to "good"; delete "in that building".
- li-e Change "all bende" to "all sharp bende",

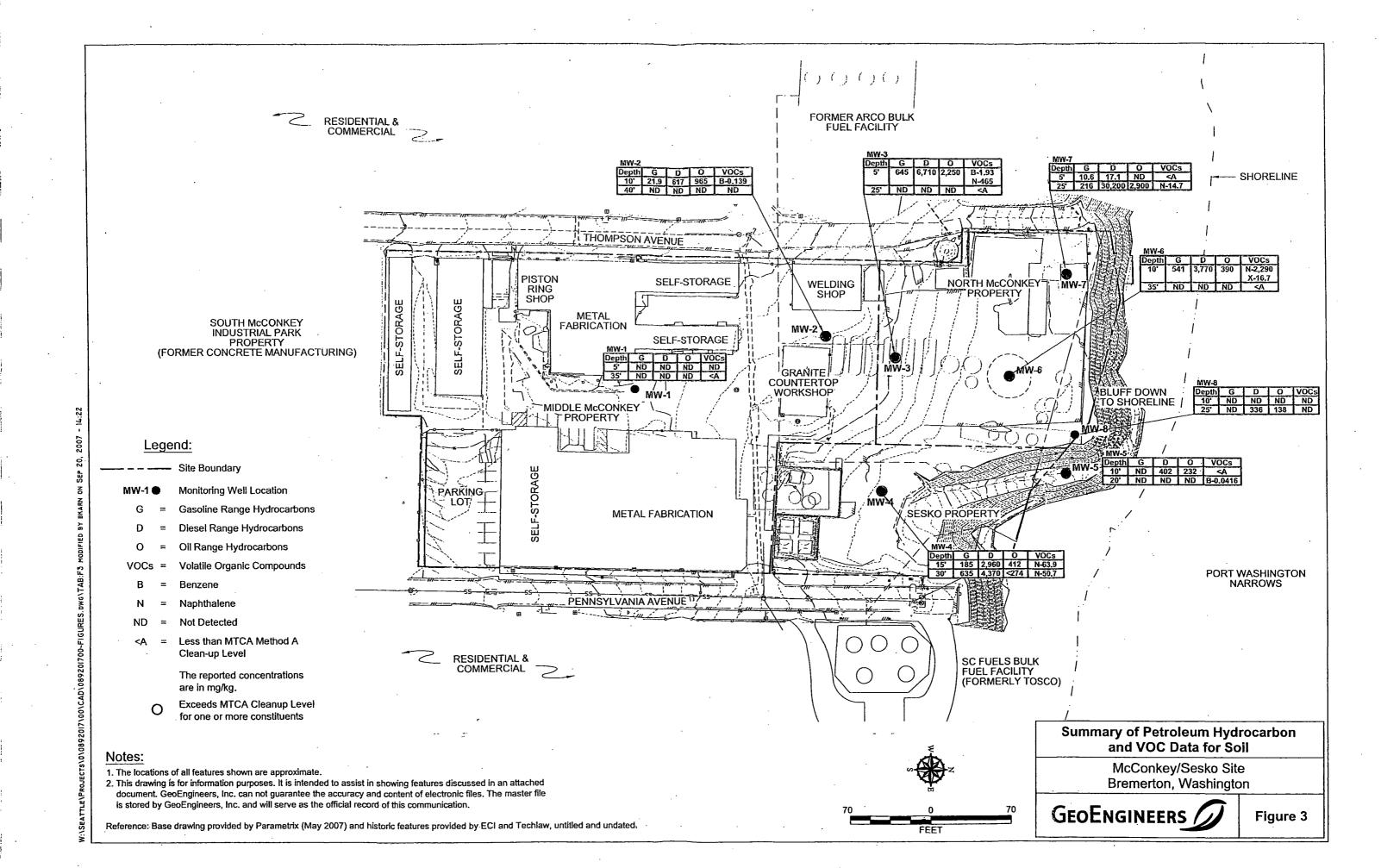
17 Change to read: "Piping to be Sloped.

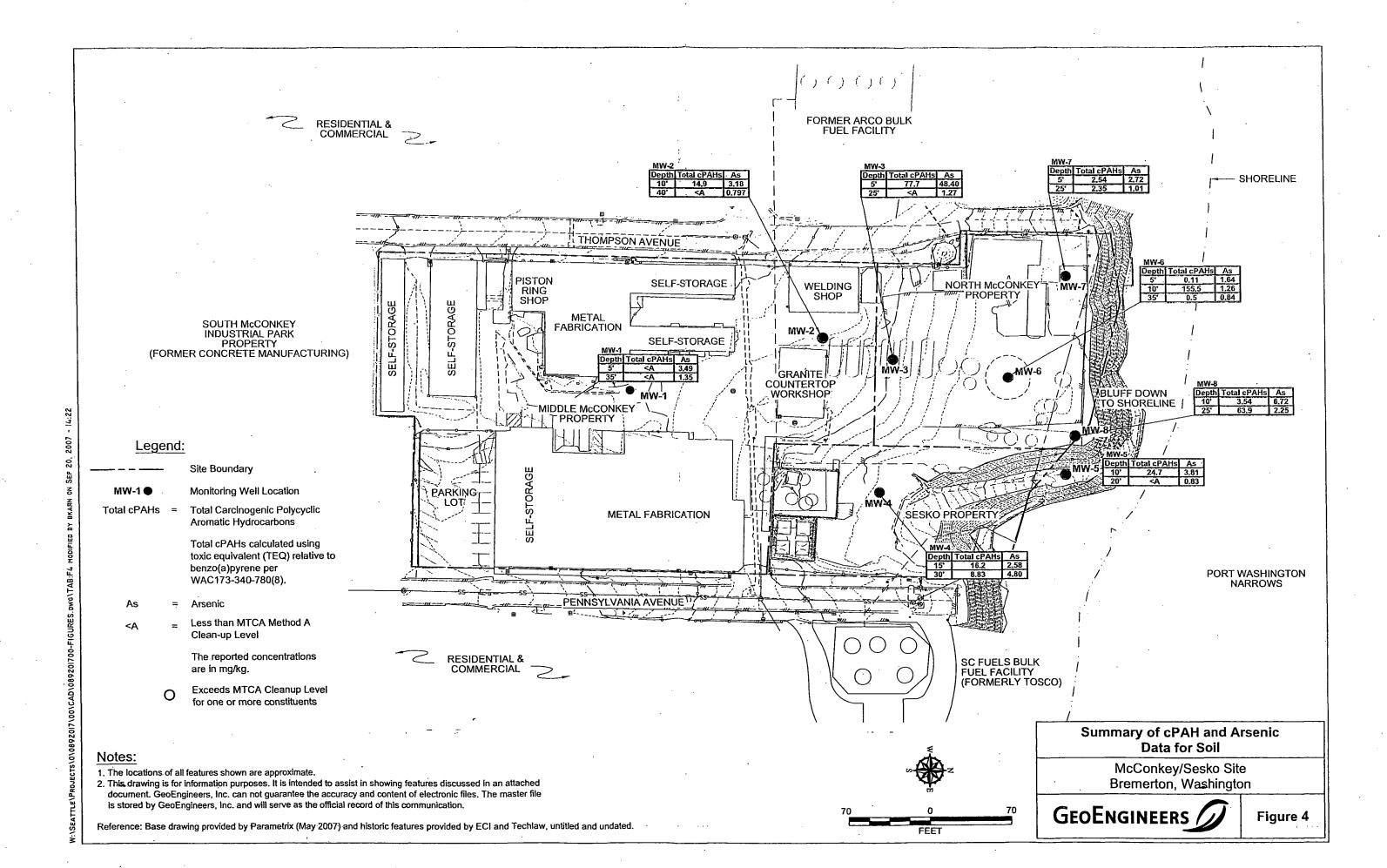
All piping shall be sloped, preferably not less than & inch in 15 feet to prevent traps. The entire piping system should drain bank towards the meter, unless the structure is so framed as to prevent this; but this rule does not permit violation of Rule 16. In the latter case, proper means must be provided to take care of the condensate.

Whether or not the appendix is intended to be part of the ordinance is problematical. If it is to be included, then exception is taken to section 9. This section is called "Inspection of New Piping", but it "concerns itself greatly with the testing of the piping by the proper administrative authority. No one is more interested in a tight piping system than the gas company, and it should do the testing without further supervision. Otherwise, the testing equipment will have to remain connected until a city inspector gats on the job. Past experience with a similar code has shown that this may take days. In the meantime the constanct is deprived of the use of gas, and the gas company's testing apparatus is tied up or must be reinstalled.

ENCLOSURE - 4







Final Bremerton Gasworks Targeted Brownfields Assessment Report Bremerton, Washington

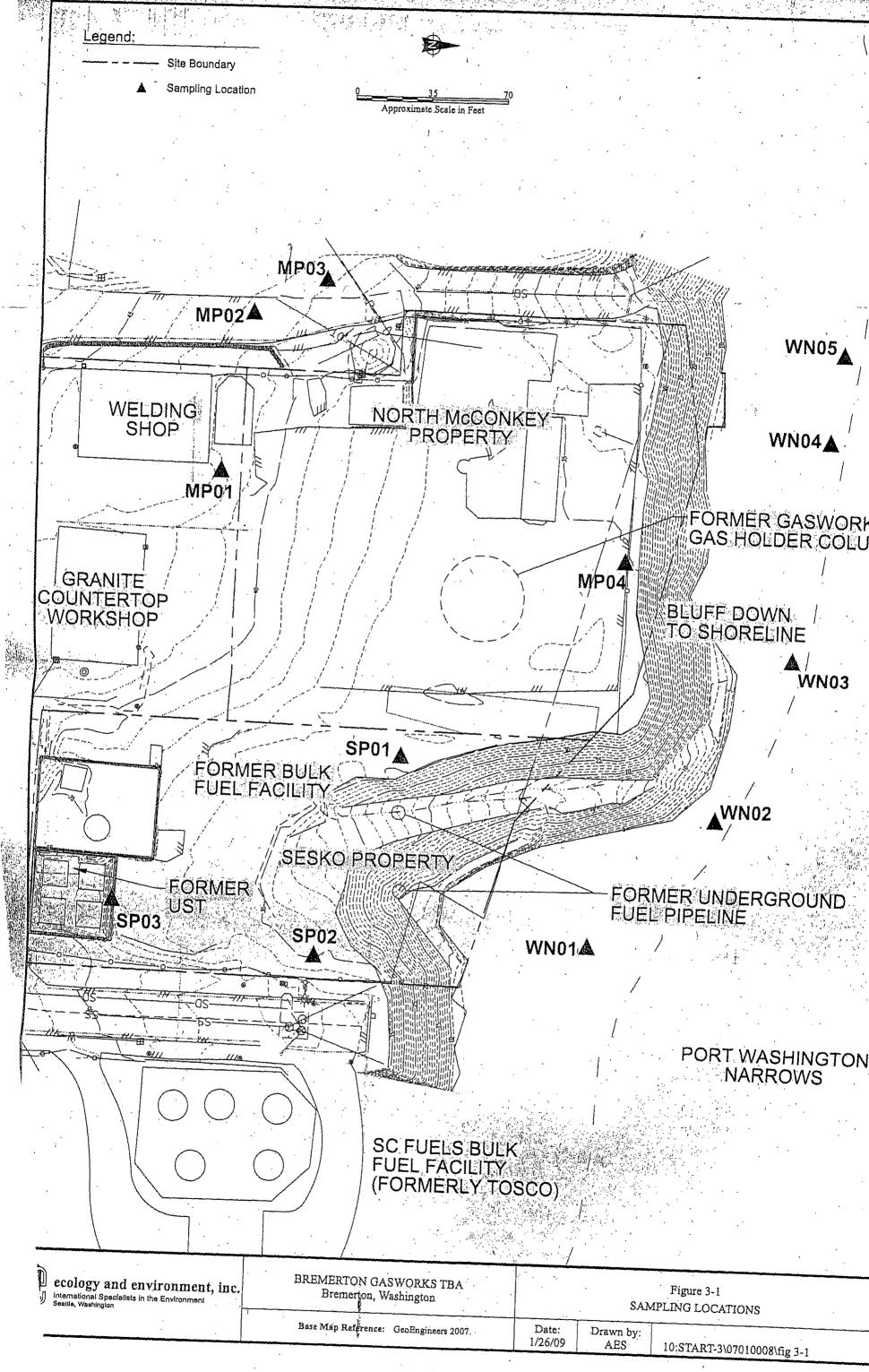
Technical Direction Document Number: 07-01-0008

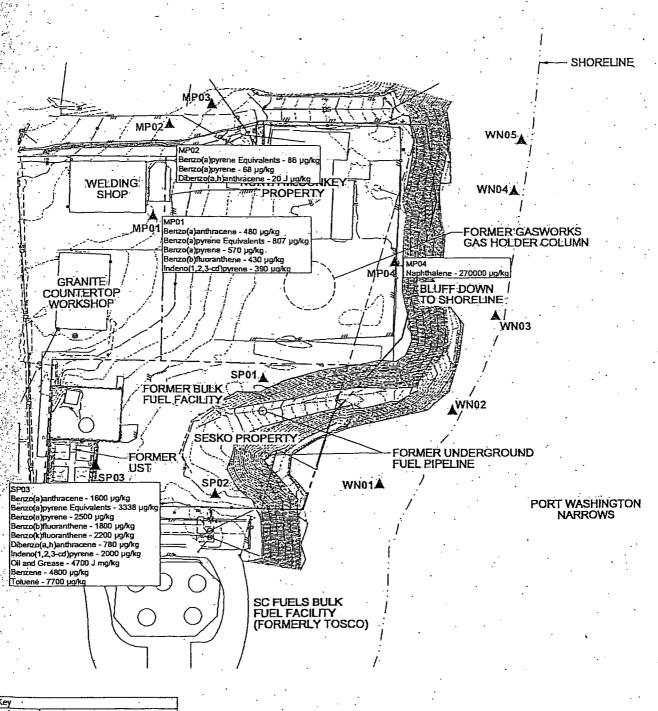
August 2009

Prepared for:
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Sixth Avenue
Seattle, Washington 98101

Prepared by:

ECOLOGY AND ENVIRONMENT, INC. 720 Third Avenue, Suite 1700 Seattle, Washington 98104





Key	
hā/kā	Microgram per kilogram
µg/L mg/kg	Microgram per liter
rng/kg	Milligram per kilogram
mg/L	Milligram per liter
J	The result is an estimated value



BREMERTON GAS WORKS TBA

Figure 3-2
Subsurface Soil Contaminant
(0-5 bgs) Concentration Map

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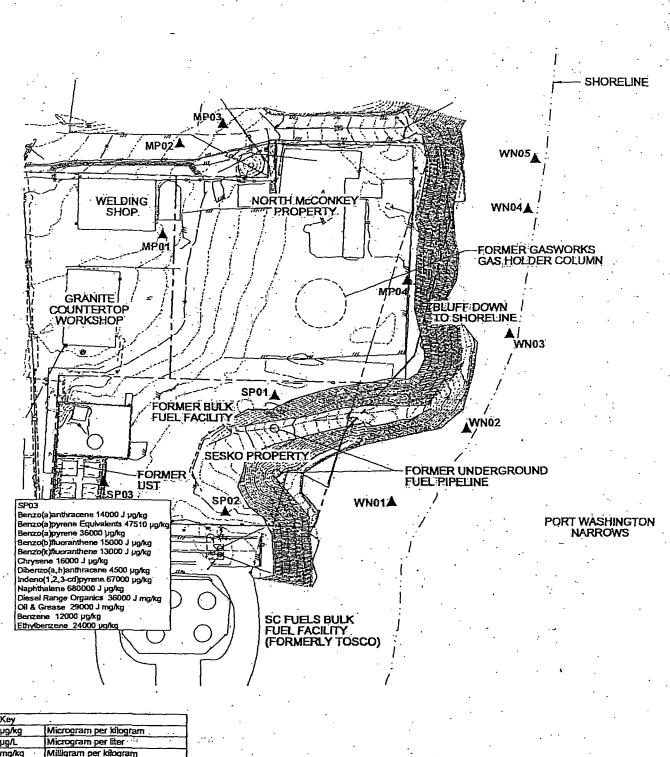
Bremerton, Washington

Job ld: 002233.0178.01BR

3/26/2009

Map Source Information:

Vedma-projects/Bramerton Gasworks/fig 0-5 bgs_m



Key		
µg/kg	Microgram per kilogram	
. µg/L	Microgram per liter	
mg/kg	Milligram per kilogram	
mg/L	Milligram per liter	
J	J The result is an estimated value	



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BREMERTON GAS WORKS TBA

Bremerton, Washington

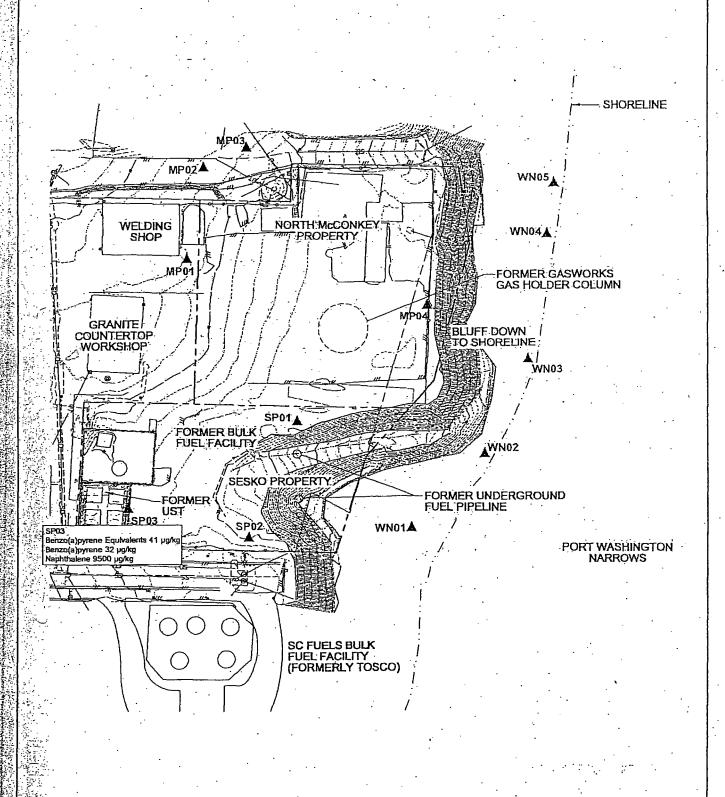
	Figure	3-3	_
Subsurfa	ice Soil	Contami	nant
(5-10 Bgs	s) Conc	entration	Map

Job ld: 002233.0178.01BR Date:

GIS Analyst 3/26/2009

Map Source Information;

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ecology and environment, inc. International Specialists in the Environment Portland, Oregon **BREMERTON GAS WORKS TBA**

Subsurface Soil Contaminant (10-15 Bgs) Concentration Map

Figure 3-4

Job Id: 002233.0178.01BR

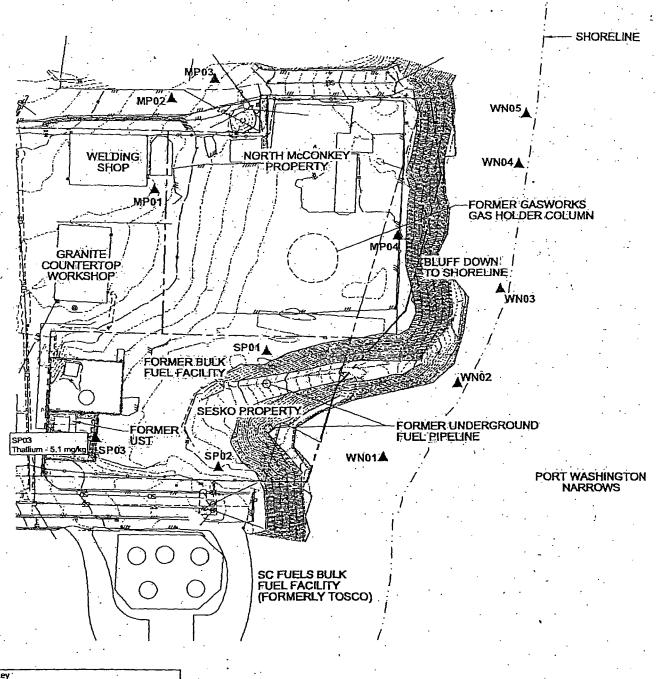
Date: 3/26/2009

Map Source Information:

GIS Analyst:

Bremerton, Washington

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Key	
µg/kg	Microgram per kilogram
µg/L	Microgram per liter
mg/kg	Milligram per kilogram
mg/L	Milligram per liter
J	The result is an estimated value



BREMERTON GAS WORKS TBA

Figure 3-5
Subsurface Soil Contaminant
(15-20 Bgs) Concentration Mar

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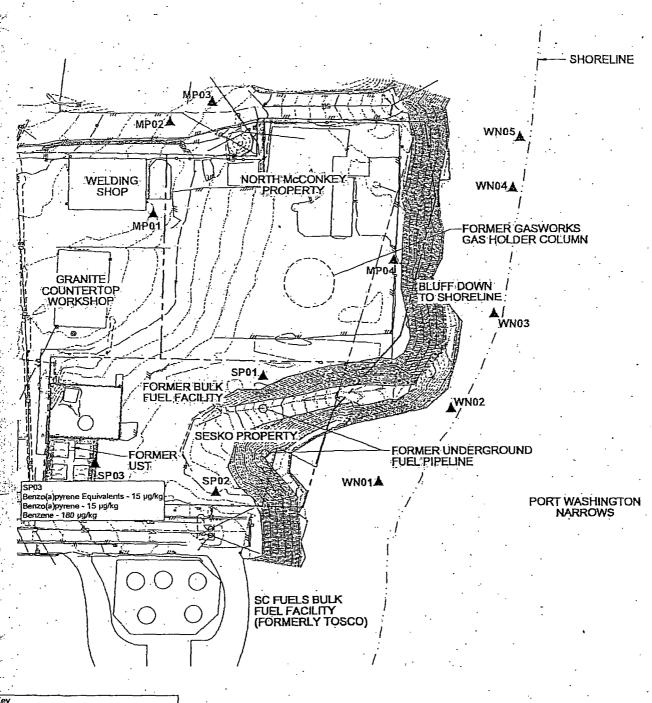
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Job ld: 002233.0178.01BR

Date: 3/26/2009 GIS Analyst:

Map Source Information:

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Key	
μg/kg	Microgram per kilogram
μg/L	: Microgram per liter.
mg/kg	Milligram per kilogram
mg/L	Milligram per liter
1	The result is an estimated value



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Bremerton, Washington

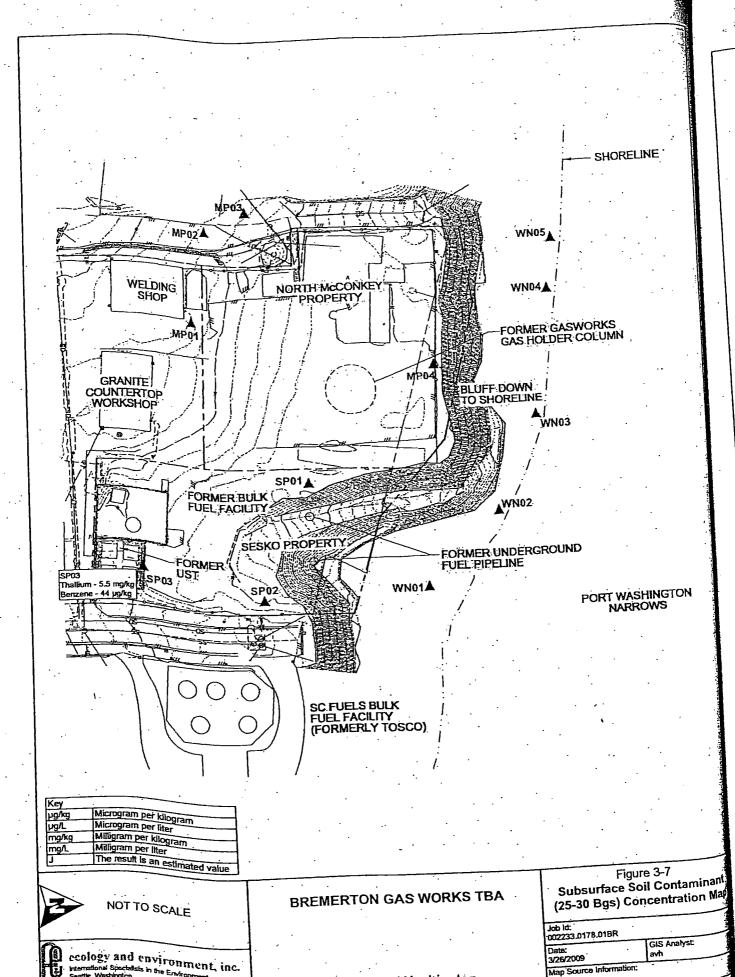
Figure 3-6
Subsurface Soil Contaminant
(20-25 Bgs) Concentration Map

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002233,0178.01BR

Date: GIS Analyst:
3/26/2009 avh

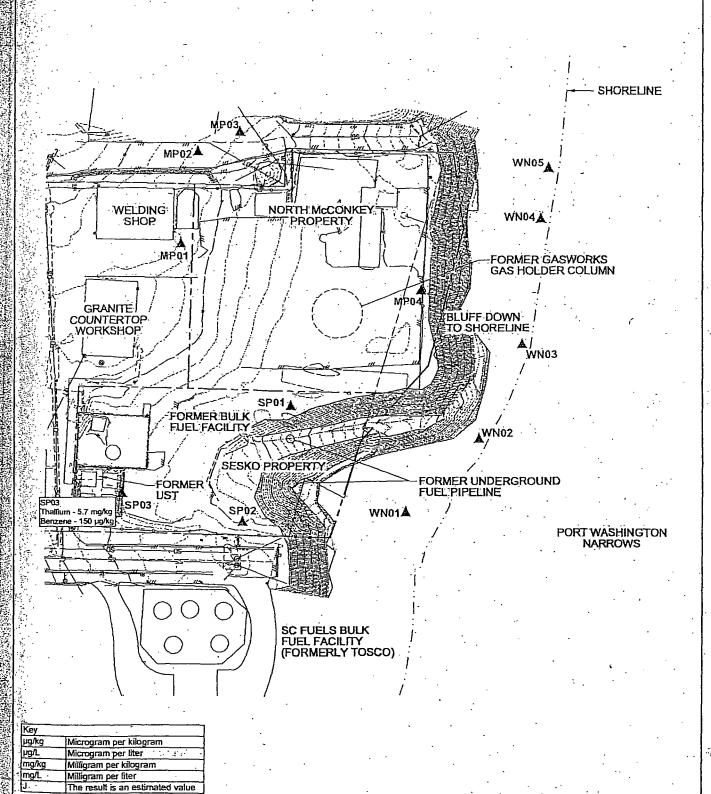
Map Source Information:

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Bremerton, Washington

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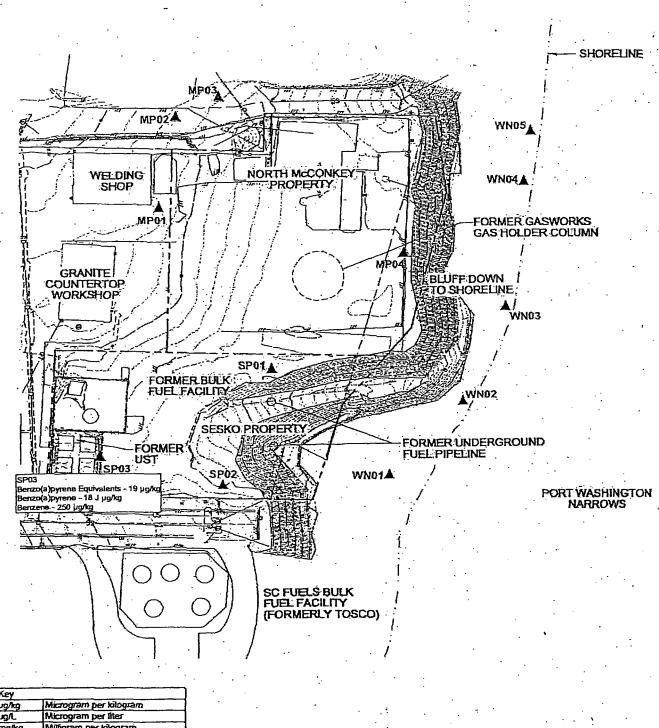
Figure 3-8
Subsurface Soil Contaminant
(30-35 Bgs) Concentration Map

Job Id: 002233.0178.01BR

Date: GIS Analyst 3/26/2009 avh
Map Source Information:

Bremerton, Washington

edms-projects\Bremerton Gasworks\lig 30-35 bgs_new.n



Key	
µg/kg	Microgram per kilogram
µg/L	Microgram per liter
ma/kg	Milligram per kilogram
mg/L	Milligram per liter
J	The result is an estimated value



BREMERTON GAS WORKS TBA

Figure 3-9 Subsurface Soil Contaminant (35-40 bgs) Concentration Map

GIS Analyst:

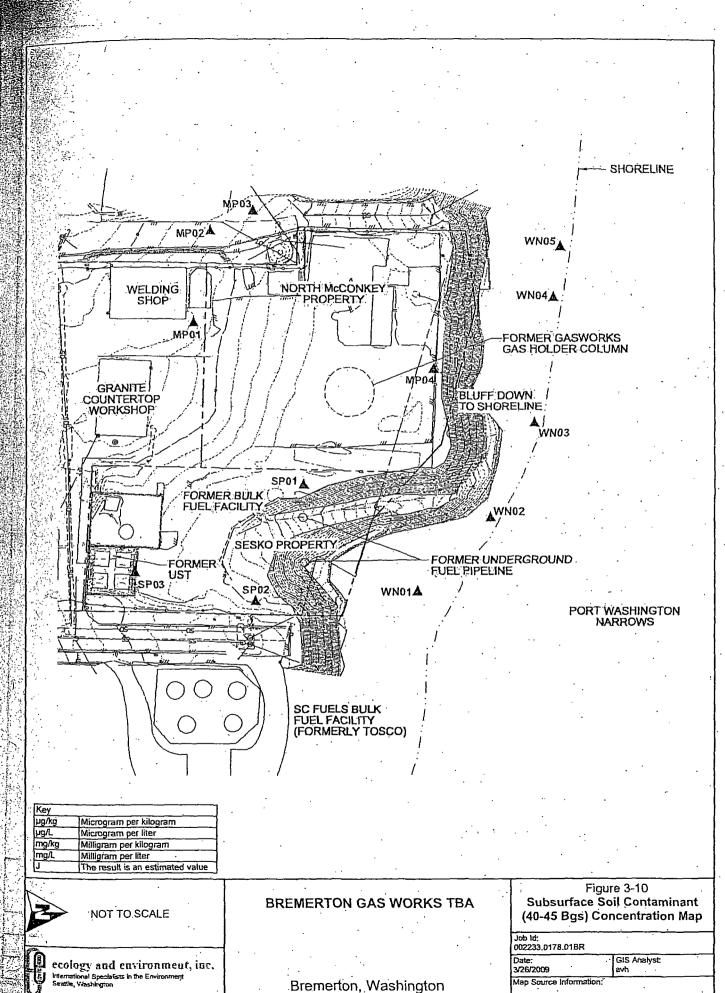
ecology and environment, inc.

Bremerton, Washington

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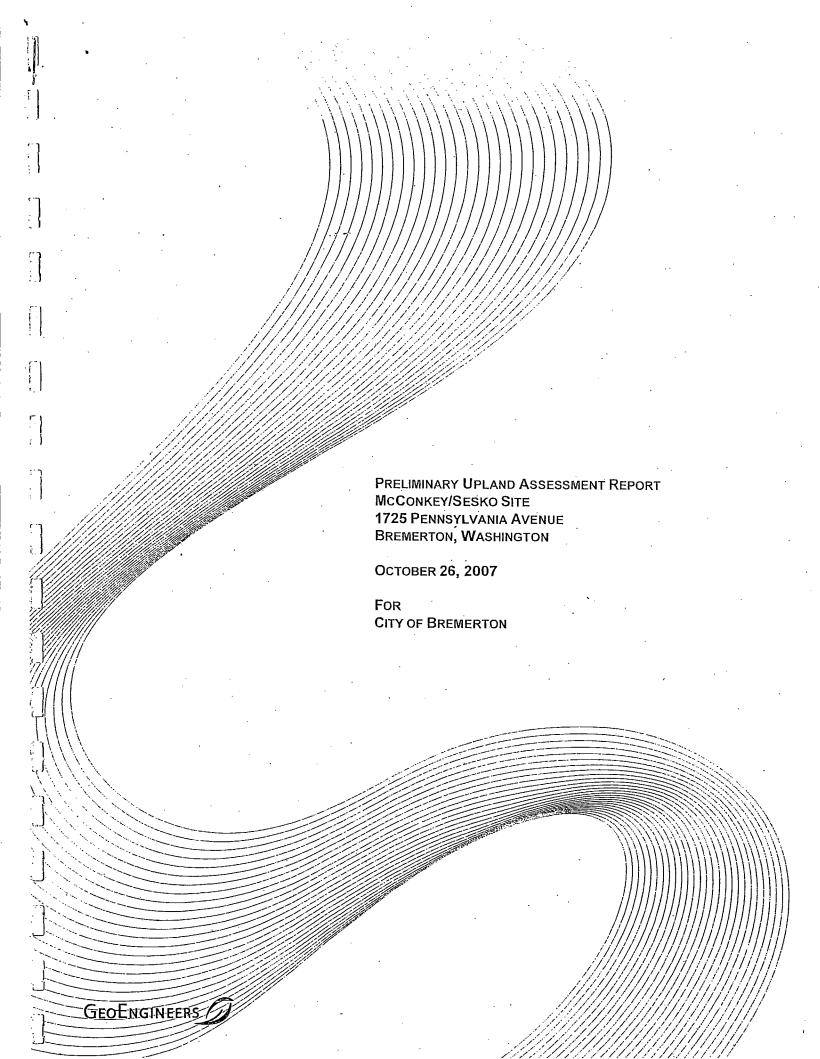
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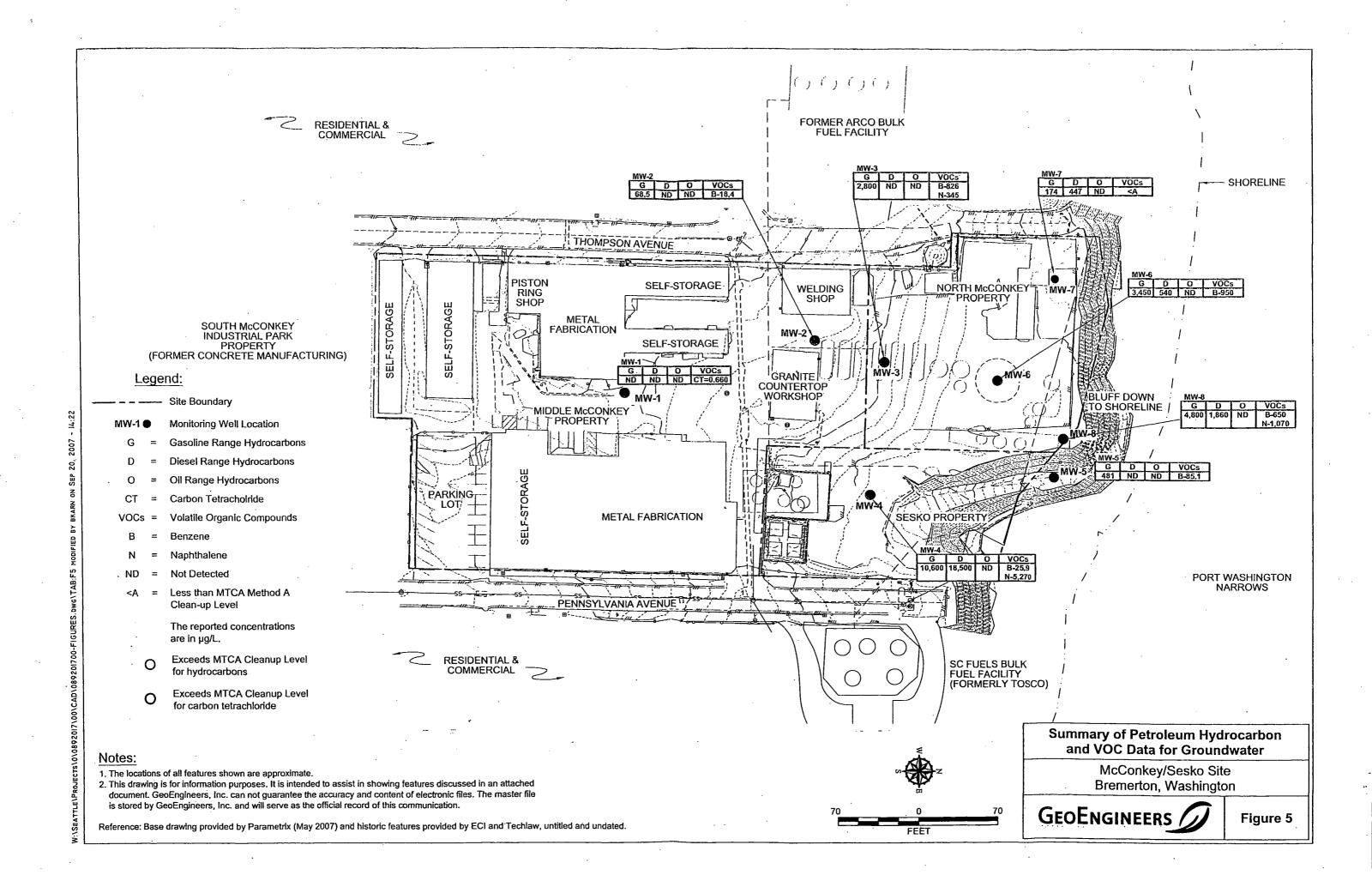
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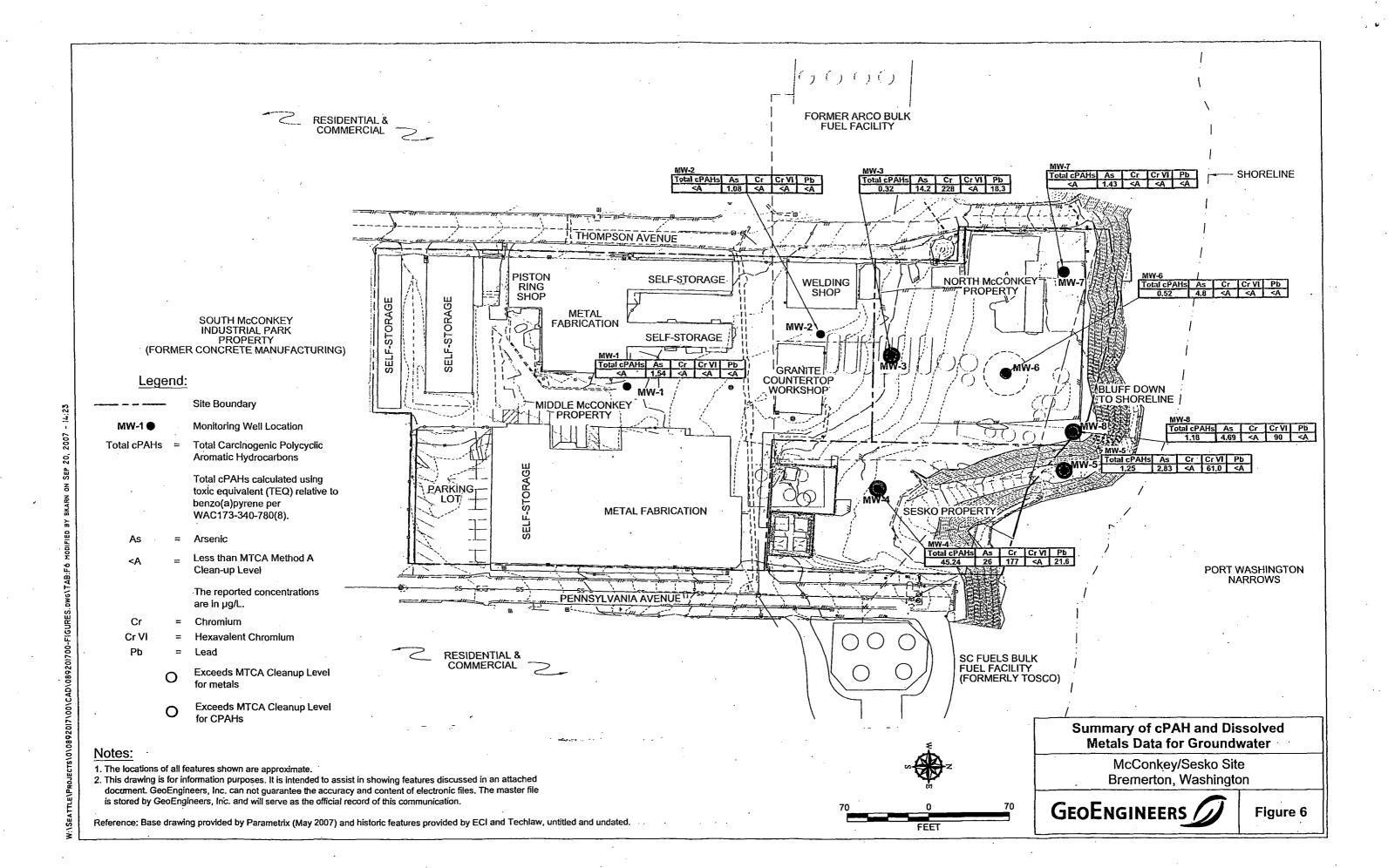


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ENCLOSURE - 6

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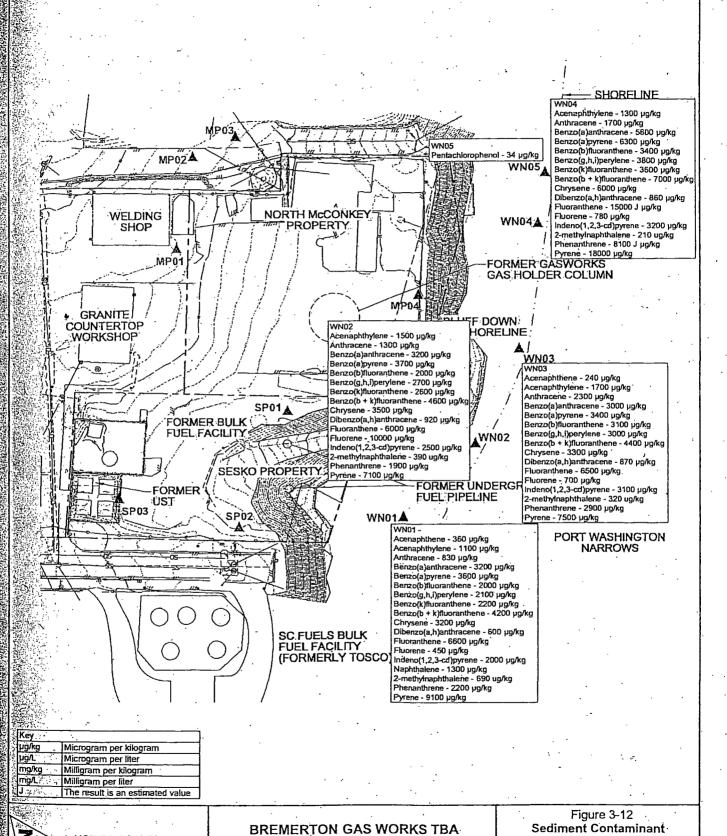
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Date

3/24/2009

Job ld: 002233.0178.01BR

Map Source Information:

Concentration Map

GIS Analyst